Storm Events

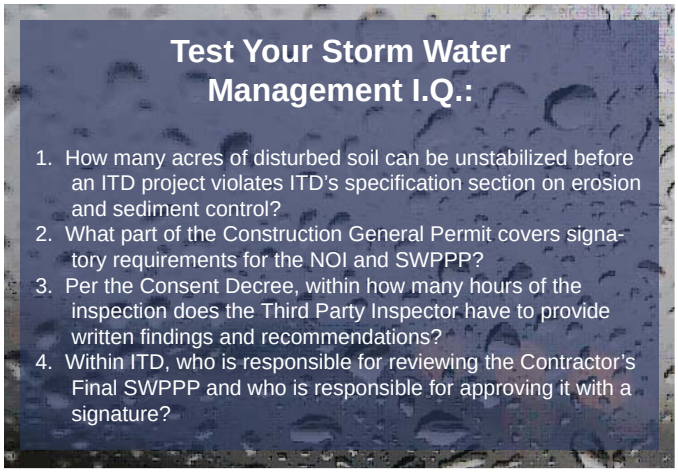
Promoting Responsible Storm Water Management Practices throughout the Idaho Transportation Department

EPA Reveals List of Top 10 Storm Water Violations

Seattle, Washington – EPA recently held a teleconference to discuss new tools developed to assist owners and contractors with storm water management and compliance with the Construction General Permit. As part of the discussion, EPA presented a list of the Top 10 Storm Water violations noted during site inspections.

Top 10 Storm Water Violations:

1. Too much disturbed area exposed at one time.
2. Missing or misunderstood erosion control (don't allow erosion. If you're only using sediment control, you've already allowed erosion).
3. Poor management of temporary stockpiles.
4. Inadequate BMP maintenance.
5. Vehicle tracking onto roads – lack of BMPs such as stabilized construction entrances or wheel wash-offs.
6. Improper solid or hazardous waste management.
7. Pollutant discharges – keep track of water leaving the site.
8. Poorly managed concrete washouts.
9. Inadequate self inspection – EPA will notice if they find a bunch of violations, but all your inspection reports show that everything is OK.
10. Inadequate upkeep and maintenance of the SWPPP (poor record keeping).



Test Your Storm Water Management I.Q.:

1. How many acres of disturbed soil can be unstabilized before an ITD project violates ITD's specification section on erosion and sediment control?
2. What part of the Construction General Permit covers signatory requirements for the NOI and SWPPP?
3. Per the Consent Decree, within how many hours of the inspection does the Third Party Inspector have to provide written findings and recommendations?
4. Within ITD, who is responsible for reviewing the Contractor's Final SWPPP and who is responsible for approving it with a signature?

Two North Idaho Developers Settle with EPA for Storm Water Violations

Coeur d'Alene, Idaho - Two north Idaho developers recently settled with the U.S. Environmental Protection Agency (EPA) for just over $9,000 for violating the storm water provisions of the federal Clean Water Act.

Black Rock Development settled for $2,700 for violations at its Black Rock North Golf Course on Loffs Bay Road in Coeur d'Alene. Pend Oreille Bonner Development, LLC settled for $6,400 for violations at its Hidden Lakes Golf Course expansion and residential development located off Highway 200 on Lower Pack River Road in Sandpoint.

Both developers violated EPA's Construction General Permit (CGP) for storm water discharges from construction activities. Due to complaints and concerns received from the public, EPA also requested that Black Rock conduct additional monitoring of its storm water discharges from its construction site.

The companies' storm water violations included:

- Deficiencies in each of their Storm Water Pollution Prevention Plans (SWPPPs);
- Failure to conduct and document self-inspections as required by the CGP; and
- Inadequate controls to prevent pollution in storm water runoff.

EPA Issues Final NPDES Permit to Idaho Falls and ITD District 6

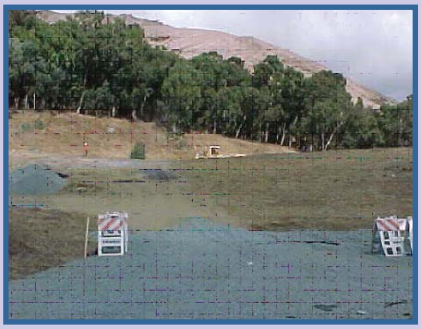
Seattle, Washington - EPA Region 10 issued a final Phase II Municipal Storm Water Permit, also known as an MS4 Permit, for the City of Idaho Falls and ITD District 6. Within the Idaho Falls Urbanized Area, the co-permittees' MS4s drain approximately 18.5 square miles.

The City's MS4 consists of storm water retention and detention basins, as well as open irrigation channels, and closed conduits. The retention basins allow runoff to evaporate or infiltrate into the ground. The detention basins allow storm runoff to be stored for a period of time allowing sediments to settle out; thereafter, the runoff water is pumped into irrigation channels that drain to the Snake River. In the older areas of the City, storm water is collected and conveyed through open channels and conduits to the Snake River.

ITD maintains a constructed MS4. Runoff from US-20, US-26 and Interstate 15 is discharged to ditches leading to the Snake River or other adjacent drainages, to detention ponds, or directly to the City's MS4.

BMP of the Quarter

BMP 2.7 – Temporary Construction Entrances



***Good* Application**

***Poor* Application**

A temporary sediment removal device made of a pad of crushed stone or rock at the approach from a temporary road to a public road or a detour. This BMP is used to limit tracking of mud off of temporary unpaved roads

Application

A stabilized construction entrance should be considered where:

- Vehicles are entering or leaving a construction site to a public road.
- Any unpaved entrance or exit where there is risk of tracking mud or sediment to the public road.

Limitations

Management measures may not be needed for entrances or approaches solely contained within the construction site.

Design Parameters

At sites where volume is high, the entrance shall be wide enough to pass two vehicles and shall have an adequate turning radius where it meets existing roads.

Construction Guidelines

Geotextile, if required, shall be installed on properly prepared surfaces prior to placement of aggregate. Place aggregate at sufficient depth to support heavy equipment and protect existing pipe culverts from crushing. The material and geotextile shall be removed after use and prior to placement of the final aggregate layer(s).

Maintenance

Inspect all measures regularly and in accordance with the NPDES and SWPPP to ensure proper performance. Remove temporary construction entrances after they are no longer needed. Make adjustments based on weekly erosion control inspections and have accumulated sediment and other debris removed and disposed of properly. At the end of construction, return to natural conditions using permanent erosion and sediment control BMPs. Remove or stabilize trapped sediment and permanently stabilize disturbed areas.

For detailed information please refer to ITD Standard Specifications, Sections 104.05, 104.06, 107.02, 107.11, 205.03, & 212. ITD Standard Drawing P-1-F, P-1-G.

ITD Storm Water Frequently Asked Questions (FAQs)

Q1: Do I need to include the gravel source as part of my disturbed area when developing and implementing the project SWPPP?

A1: It depends on the use of the gravel site. If the gravel site was opened specifically for your project and will support only your project, then yes it should be included as part of the overall project SWPPP. However, if the gravel site is being used for multiple projects then the gravel pit operation would have its own SWPPP covered under the NPDES Multi-Sector General Permit (MSGP) Program. Under the MSGP, the owner of the gravel pit is responsible for submitting the NOI and developing the industrial SWPPP for the site. In this case, neither ITD nor its Contractor is responsible for storm water management at the gravel pit.

Quiz Answers:

1. According to ITD Specification Section 212.03, the surface area of disturbed erodible material shall not exceed 5 acres (2 ha) without installation of erosion and sediment control methods unless otherwise approved in writing.
2. Appendix G, Subsection 11.
3. Per the Consent Decree Para II.B.9, the third party consultant shall provide written findings and recommendations within 24 hours of inspection.
4. The Resident Engineer is responsible for reviewing and at a minimum, the Assistant District Engineer is responsible for signing.

Q2: If I'm street sweeping at the end of each construction day, do I still need to install temporary construction entrances?

A2: Yes. EPA expects a combination of BMPs to be in place so that the contractor is not relying on any one BMP for full compliance. By employing only street sweeping at the end of each day, the contractor has fallen into a reactive mode by allowing sediment transport to happen. If sweeping is only happening at the end of the day, sediment that's leaving the site at mid day could be tracked off site and potentially find its way to a water body. Construction entrances are a proactive approach to sediment control by preventing sediment transport from occurring and thereby limiting potential for sediment to leave the site. If necessary, street sweeping should be done in combination with construction entrances.

Q3: Can I update my Notice of Intent (NOI) if, for example, my project scope has changed or the Contractor has changed?

A3: Yes. The EPA understands that changes may occur on construction projects which may require a change in to the project's NOI. The four main areas where changes typically occur are:

1. Corrections to Owner/Operator information
2. Correction to Project/Site information
3. Correction to location of SWPPP for viewing
4. Correction to discharge information

The NOI Modification Form can be found at the following website: *http://www.epa.gov/npdes/pubs/cgp_modify.pdf*